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*Attorneys for Defendants:*  
*IRVING J. PINTO 1996 GRANTOR RETAINED*  
*ANNUITY TRUST; IRVING J. PINTO 1994*  
*GRANTOR RETAINED ANNUITY TRUST;*  
*SIDNEY KAPLAN, in his/her capacity as Trustee*  
*of the Irving J. Pinto 1996 Grantor Retained*  
*Annuity Trust and the Irving J. Pinto 1994*  
*Grantor Retained Annuity Trust; ESTATE OF IRVING*  
*J. PINTO; and JAMIE PINTO, in his capacity as*  
*Personal Representative of the Estate of Irving J. Pinto.*

**UNITED STATES BANKRUPTCY COURT**  
**SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Adv. Pro. No. 08-01789 (SMB)

Plaintiff-Applicant,

SIPA LIQUIDATION

v.

(Substantively Consolidated)

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

**Debtor.**

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC,

Adv. Pro. No. 10-04744 (SMB)

Plaintiff,

V.

IRVING J. PINTO 1996 GRANTOR RETAINED ANNUITY TRUST; IRVING J. PINTO 1994 GRANTOR RETAINED ANNUITY TRUST; SIDNEY KAPLAN, in his/her capacity as Trustee of the Irving J. Pinto 1996 Grantor Retained Annuity Trust and the Irving J. Pinto 1994 Grantor Retained Annuity Trust; ESTATE OF IRVING J. PINTO; and JAMIE PINTO, in his capacity as Personal Representative of the Estate of Irving J. Pinto,

## Defendants.

**AFFIDAVIT OF JAMIE PINTO IN SUPPORT OF DEFENDANTS' COUNSEL ROBERT  
M. McCLAY AT THE LAW FIRM OF McCLAY•ALTON, P.L.L.P. AND  
DEFENDANTS' COUNSEL MARVIN C. INGBER FOR AN ORDER PURSUANT TO  
RULE 2090-1(e) OF THE LOCAL BANKRUPTCY RULES TO REMOVE BRUCE S.  
SCHAEFFER AS COUNSEL TO DEFENDANTS**

Jamie Pinto, individually and in his capacity as Personal Representative of the Estate of Irving J. Pinto being first duly sworn under oath, deposes and states:

1. On or about March 2012, I terminated representation by Bruce S. Schaeffer ("Mr. Schaeffer").
2. On or about March 2012, I retained Robert M. McClay at the law firm of McClay•Alton, P.L.L.P and Marvin C. Ingber as counsel in the above-captioned case.

3. Robert M. McClay and Marvin C. Ingber have been unable to obtain Mr. Schaeffer's cooperation to remove himself as counsel.

4. I have authorized this action to formally remove Mr. Schaeffer as attorney of record in this matter and to have him removed from all service lists.

*Yilmaz Spruhs*  
Dated: Los Angeles, California

April 1 2015

By:   
*JAMIE PINTO individually and in his capacity  
as Personal Representative of the Estate of  
Irving J. Pinto*

Subscribed and sworn to before me  
this 9 day of April, 2015.

*Yilmaz Spruhs*  
Notary Public

